

1 Arezoo Jamshidi (Bar No. 284220)
ajamshidi@hbblaw.com
2 Allison E. Harvey (Bar No. 356525)
aharvey@hbblaw.com
3 HAIGHT BROWN & BONESTEEL LLP
edocs@hbblaw.com
4 402 West Broadway, Suite 1850
San Diego, California 92101
5 Telephone: 619-595-5583
Facsimile: 619-595-7873

6 Attorneys for Defendants THE GUILD LAW SCHOOL DBA
7 PEOPLE'S COLLEGE OF LAW, JOSHUA GILLENS,
WILLIAM MAESTAS, BOARD OF DIRECTORS FOR THE
8 PEOPLE'S COLLEGE OF LAW, CHRISTINA MARIN
GONZALEZ; ROGER ARAMAYO; ISMAIL VENEGAS;
9 CLEMENTE FRANCO; HECTOR PENA; PASCUAL
TORRES; CAROL DEUPREE; JESSICA VIRAMONTES;
10 JUAN SARINANA; ADRIANA ZUNIGA; PREM SARIN;
DAVID BOUFFARD; and HECTOR SANCHEZ

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
14

15 TODD R. G. HILL,
16 Plaintiff,

17 v.

18 THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
19 INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW; et al.

20 Defendants.
21

Case No. 2:23-cv-01298-JLS-BFMx

**DEFENDANTS' OPPOSITION TO
PLAINTIFF'S NOTICE OF
SUBMISSION OF PROPOSED
FIFTH AMENDED COMPLAINT**

Judge: Josephine L. Staton
Magistrate: Brianna Fuller Mircheff

22 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR
23 COUNSEL OF RECORD:

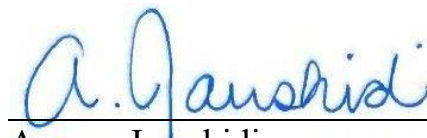
24 COMES NOW the Defendants THE GUILD LAW SCHOOL DBA
25 PEOPLE'S COLLEGE OF LAW, JOSHUA GILLENS, WILLIAM MAESTAS,
26 BOARD OF DIRECTORS FOR THE PEOPLE'S COLLEGE OF LAW,
27 CHRISTINA MARIN GONZALEZ, ROGER ARAMAYO, ISMAIL VENEGAS,;
28 CLEMENTE FRANCO, HECTOR PENA, PASCUAL TORRES, CAROL

DEUPREE, JESSICA VIRAMONTES, AND JUAN SARINANA (hereinafter collectively referred to as “Defendants”) submit the following Opposition to Plaintiff’s Notice of Submission of Proposed Fifth Amended Complaint and Memorandum of Points and Authorities in Support of Opposition to Plaintiff’s Notice of Submission of Proposed Fifth Amended Complaint.

DATED: May 30, 2025

HAIGHT BROWN & BONESTEEL LLP

By:



Arezoo Jamshidi

Allison E. Harvey

Attorneys for Defendants THE GUILD
LAW SCHOOL DBA PEOPLE’S
COLLEGE OF LAW, JOSHUA
GILLENS, WILLIAM MAESTAS,
BOARD OF DIRECTORS FOR THE
PEOPLE’S COLLEGE OF LAW,
CHRISTINA MARIN GONZALEZ;
ROGER ARAMAYO; ISMAIL
VENEGAS; CLEMENTE FRANCO;
HECTOR PENA; PASCUAL TORRES;
CAROL DEUPREE; JESSICA
VIRAMONTES; JUAN SARINANA;
ADRIANA ZUNIGA; PREM SARIN;
DAVID BOUFFARD; and HECTOR
SANCHEZ

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Plaintiff Todd Hill (“Plaintiff”) seeks to file a Proposed Fifth Amended Complaint purportedly “in response to arguments raised” in the pending motions to dismiss the Fourth Amended Complaint. Though styled as a Notice of Submission, Plaintiff’s filing is plainly a request for leave to amend—a request that should be denied.

Plaintiff has had ample opportunity—seven times to be specific—to craft a proper complaint. Defendants’ prior motions to dismiss have repeatedly identified specific deficiencies—both legal and factual—in Plaintiff’s pleadings. The Court itself has issued detailed reports and recommendations highlighting these same defects and providing recommendations to Plaintiff. Yet, despite this extensive procedural history and guidance, Plaintiff continues to file voluminous, confusing, and legally deficient complaints that fail to comply with basic pleading standards, continuously fail to cure the previous defects and include new deficiencies.

The Proposed Fifth Amended Complaint illustrates this ongoing failure. At 186 pages, it is even longer than the 181-page Fourth Amended Complaint, and it is riddled with over 200 paragraphs that Plaintiff routinely cross-references and incorporates by reference throughout. The Proposed Fifth Amended Complaint once again violates Rule 8 by failing to provide a “short and plain statement” of the claims and fails to clearly delineate which causes of action are asserted against which Defendants. As a result, Defendants are left to guess the nature and scope of the allegations against them.

Most importantly, and unsurprisingly, the Proposed Fifth Amended Complaint does not cure the defects previously identified by the Court or addressed in the pending motions to dismiss the Fourth Amended Complaint. Plaintiff has neither justified this latest amendment nor demonstrated that the proposed changes resolve the fundamental pleading issues that have plagued each prior iteration of his

1 complaint. Accordingly, the Court should deny Plaintiff's submission of the
2 Proposed Fifth Amended Complaint and deny any such request for leave to amend.

3 **II. PROCEDURAL BACKGROUND**

4 On February 20, 2023, Plaintiff initiated this action by filing his initial
5 Complaint. [Dkt. No. 1.] On April 5, 2023, the Court, on its own motion, dismissed
6 the Complaint for violating Federal Rule of Civil Procedure 8(a) and (d), granting
7 Plaintiff leave to amend. [Dkt. No. 37.] The Court's order explained in detail why
8 the Complaint was improper and failed to comply with the Federal Rules.

9 On April 18, 2023, Plaintiff filed a First Amended Complaint. [Dkt. No. 38.]
10 On May 5, 2023, Plaintiff filed a "Motion for Leave to Supplement" the First
11 Amended Complaint and attached a proposed 114-page "Supplemental First
12 Amended Complaint." [Dkt. No. 40.] On June 7, 2023, the Court denied the motion
13 to supplement and again dismissed the First Amended Complaint with leave to
14 amend, explaining the continued violations of the Federal Rules and Local Rules.
15 [Dkt. No. 45.] The Court expressly instructed Plaintiff that any Second Amended
16 Complaint must be complete, self-contained, and comply with Rule 8's requirement
17 of a short and plain statement of the claims.

18 Plaintiff failed to timely file a Second Amended Complaint. Consequently, on
19 July 27, 2023, the Court entered a Judgment of Dismissal for failure to comply with
20 the 21-day deadline. [Dkt. No. 47.] Over a month later, on September 7, 2023,
21 Plaintiff filed both a "Motion for Leave to File a Second Amended Complaint and to
22 Set Aside Judgment" [Dkt. No. 48], and the Second Amended Complaint itself [Dkt.
23 No. 49], despite the fact that his motion had not been granted and the judgment
24 remained in effect.

25 On September 18, 2023, the Court struck the improperly filed Second
26 Amended Complaint [Dkt. No. 51] but granted Plaintiff's motion to set aside the
27 judgment, giving him 14 days to file an amended complaint. [Dkt. No. 54.] Plaintiff
28 filed the Second Amended Complaint on September 20, 2023. [Dkt. No. 55.]

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1 On April 23, 2024, Magistrate Judge Brianna Fuller Mircheff issued an
2 Interim Report and Recommendation recommending dismissal of the Second
3 Amended Complaint under Rule 8. The Report emphasized that the 121-page
4 Second Amended Complaint was excessively long, confusing, and continued to
5 exhibit the characteristics of a “shotgun pleading,” despite the Court’s repeated
6 warnings.

7 On August 12, 2024, the Court accepted the Report and Recommendation.
8 [Dkt. No. 145.] The Court dismissed the Second Amended Complaint in its entirety
9 for failure to comply with Rule 8 and dismissed several claims and parties with
10 prejudice, including: (1) all claims against the State Bar and its departments or
11 committees (except certain Title IX claims); (2) all official capacity claims against
12 individual State Bar defendants (except certain Title IX claims and limited
13 injunctive/declaratory claims); (3) Plaintiff’s Sixth Cause of Action to the extent it
14 sought federal bar admission; (4) the Fourteenth, Fifteenth, and Sixteenth Causes of
15 Action brought under 18 U.S.C. §§ 241, 242, and 245 for lack of a private right of
16 action; and (5) the Office of Chief Trial Counsel, Board of Trustees, Office of
17 Admissions, and Office of General Counsel. [Dkt. No. 145.]

18 On August 21, 2024, Plaintiff filed a Third Amended Complaint, which was
19 not served on Defendants until August 26, 2024. [Dkt. No. 148.] Defendant Ira
20 Spiro filed a motion to dismiss on September 4, 2024, and amended the motion the
21 following day. [Dkt. Nos. 152, 154.] On September 6, 2024, Plaintiff filed a motion
22 seeking leave to amend the Third Amended Complaint. [Dkt. No. 163.] Defendants
23 also filed their own motion to dismiss the Third Amended Complaint, which was
24 initially struck by the Court for procedural defects [Dkt. Nos. 159, 162], but later
25 refiled on September 12, 2024. [Dkt. No. 165.] The State Bar Defendants separately
26 moved to dismiss the Third Amended Complaint on September 23, 2024. [Dkt. No.
27 172.]
28

1 Again, Magistrate Judge Brianna Fuller Mircheff recommended dismissal for
2 failure to state a federal cause of action against any defendant. [Dkt. No. 213.] On
3 March 27, 2025, the Court dismissed the complaint and precluded Plaintiff from
4 pleading causes of action other than the RICO and state law claims. [Dkt. No. 248.]

5 On March 31, 2025, Plaintiff filed his Fourth Amended Complaint, and, on
6 April 1, 2025, amended this filing with a new Fourth Amended Complaint. [Dkt.
7 Nos. 255, 257.] On April 13, 2025, Defendant Spiro filed a motion to dismiss
8 Plaintiff's Fourth Amended Complaint. [Dkt. No. 263.] On April 17, 2025,
9 Defendants filed their motion to dismiss the Fourth Amended Complaint. [Dkt. No.
10 270.] This Court has yet to rule on these motions to dismiss.

11 Now, on May 19, 2025, Plaintiff has submitted a Proposed Fifth Amended
12 Complaint "in response to arguments raised in Defendants' pending motions to
13 dismiss." [Dkt. No. 310.]

14 **III. ARGUMENT**

15 **A. Federal Rule of Civil Procedure 15(a)(2) and 59(e) Do Not Provide**
16 **Authority for Plaintiff to Amend His Complaint.**

17 Plaintiff relies exclusively on Federal Rules of Civil Procedure 15(a)(2) and
18 59(e) to justify the filing of his Proposed Fifth Amended Complaint. According to
19 Plaintiff, he is submitting this proposed amendment "consistent with the Court's
20 discretion to permit amendment under Rule 15(a)(2) or to grant post-judgment relief
21 under Rule 59(e)." [Dkt. No. 310.] Plaintiff's reliance on both rules is fundamentally
22 misplaced and procedurally flawed.

23 Under Rule 15(a)(2), "a party may amend its pleading only with the opposing
24 party's written consent or the court's leave." Fed. R. Civ. P. 15(a)(2). Here, Plaintiff
25 has not obtained Defendants' consent, nor has the Court granted leave to file a Fifth
26 Amended Complaint. Plaintiff's claim that the amendment is "in the interest of
27 judicial economy" ignores both the procedural requirement for leave and the
28 substantive context of the repeated, unsuccessful attempts to plead a viable

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1 complaint—despite the Court’s generous allowance of multiple opportunities to
2 amend. Repeated amendments that fail to cure longstanding deficiencies do not
3 promote judicial economy—particularly where Plaintiff has been repeatedly given
4 specific instructions on how to do so—they undermine it.

5 Furthermore, the Court has not even ruled on Defendants’ motions to dismiss
6 the Fourth Amended Complaint, yet Plaintiff already seeks leave to file a Fifth.
7 Plaintiff sought similar relief after Defendants filed their motions to dismiss the
8 Third Amended Complaint. This pattern of serial amendments—without awaiting
9 rulings on existing motions—wastes judicial resources and imposes unnecessary
10 burdens on the parties. Far from promoting judicial economy, it fosters procedural
11 inefficiency and delay.

12 Moreover, Rule 59(e) is wholly inapplicable. Rule 59(e) states: “A motion to
13 alter or amend a judgment must be filed no later than 28 days after the entry of the
14 judgment.” Fed. R. Civ. P. 59(e). It does not authorize the filing of an amended
15 complaint, nor does it provide a procedural basis for amending pleadings at this
16 stage of the litigation. Plaintiff has not filed a proper Rule 59(e) motion. To the
17 extent Plaintiff invokes Rule 59(e) to support his ability to amend, such invocation
18 is procedurally improper and legally baseless.

19 Accordingly, Plaintiff’s submission of the Proposed Fifth Amended
20 Complaint—especially in light of the fact that this Court has not even ruled on
21 Defendants’ motion to dismiss Plaintiff’s Fourth Amended Complaint—lacks any
22 valid procedural foundation under either Rule 15(a)(2) or Rule 59(e), and should be
23 rejected on that basis alone.

24 **B. The Court Should Deny Plaintiff Leave to Amend Where**
25 **Defendants Will Be Prejudiced and Where Amendment Will be**
26 **Futile.**

27 Although Plaintiff has submitted what he entitles the “Proposed Fifth
28 Amended Complaint,” this would in fact be his seventh iteration of the pleading—

1 including multiple prior amended complaints that failed to state viable claims.
2 Plaintiff's conclusory assertion that the proposed amendment is justified is without
3 merit.

4 "In determining whether leave to amend is appropriate, the district court
5 considers 'the presence of any of four factors: bad faith, undue delay, prejudice to
6 the opposing party, and/or futility.'" *Owens v. Kaiser Found. Health Plan, Inc.*, 244
7 F.3d 708, 712 (9th Cir. 2001) (additional citation omitted). Of these, "[p]rejudice is
8 the touchstone of the inquiry under Rule 15(a)." *Eminence Capital, LLC v. Aspeon,*
9 *Inc.*, 316 F.3d 1048, 1052 (9th Cir. 2003) (internal quotations omitted).

10 This Court's discretion to deny leave to amend is "particularly broad" where
11 the plaintiff has previously amended the complaint. *Salameh v. Tarsadia Hotel*, 726
12 F.3d 1124, 1133 (9th Cir. 2013) (plaintiff had "ample opportunity to properly plead
13 a case"). Courts have routinely denied leave to amend under such circumstances,
14 especially where, as here, Plaintiff offers no adequate explanation for repeated
15 deficiencies or for failing to take advantage of prior opportunities to amend. *Jang v.*
16 *Boston Scientific Scimed, Inc.*, 729 F.3d 357, 368 (3d Cir. 2013) ("This court has
17 declined to reward a wait-and-see approach to pleading"). "A plaintiff may not in
18 substance say 'trust me,' and thereby gain a license for further amendment when
19 prior opportunity to amend had been given." *Salameh, supra*, 726 F.3d 1124 at p.
20 1133.

21 Here, Plaintiff contends that his proposed amendment is warranted as a
22 "response to arguments raised" in the pending motions to dismiss the Fourth
23 Amended Complaint. [Dkt. No. 310.] But Plaintiff's continued strategy of
24 piecemeal, reactionary pleading has caused significant inefficiency and
25 compounding prejudice. Defendants have been forced to devote substantial time and
26 resources to analyzing each new and confusing version of the complaint and
27 engaging in repeated meet-and-confer efforts. These efforts are further complicated
28 by Plaintiff's persistent accusations that are baseless but nonetheless require

1 Defendants to expend additional time and effort explaining their good-faith conduct
2 to both Plaintiff and the Court. This pattern of shifting pleadings, coupled with
3 meritless procedural disputes, imposes undue burdens on all parties and undermines
4 the efficient resolution of this case. It provides ample reason to deny further leave to
5 amend. See *Owens, supra*, 244 F.3d at p. 712.

6 More importantly, Plaintiff’s proposed Fifth Amended Complaint continues
7 to fail to cure the very deficiencies this Court and Defendants have repeatedly
8 identified. Like the prior versions, the proposed complaint is not “short and plain” as
9 required by Rule 8. It grows in length and complexity, while continuing to rely on
10 impermissible “shotgun pleading” tactics that the Court criticized in its denial of
11 Plaintiff’s request to supplement the First Amended Complaint. [Dkt. No. 45, pp. 5-
12 6.] Plaintiff asserts causes of action against groups of defendants without identifying
13 the specific conduct attributable to each person, improperly incorporates long blocks
14 of previous paragraphs “with particular emphasis,” and relies on vague, collective
15 definitions like “Board of Directors” or “Agents” without identifying which
16 individuals fall within each category. As a result, Defendants are left guessing as to
17 the basis of the claims against them.

18 Many of the same deficiencies raised in Defendants’ motion to dismiss the
19 Fourth Amended Complaint still remain in the Proposed Fifth Amended Complaint.
20 For example, three individual defendants Prem Sarin, Edith Pomposo and Ismael
21 Venegas, are listed as a defined defendant party [see ¶¶ 8, 16 & 20] yet there are no
22 causes of action asserted against them. [See Proposed Fifth Amended Complaint,
23 pp. 24, 46, 51, and 65.] Plaintiff, again, also fails to list Viramontes as a named and
24 defined defendant, yet Viramontes is included in the first and third causes of action.
25 [*Id.* at pp. 24 and 51.]¹

26
27
28 ¹ Plaintiff does not bother providing a first name for Viramontes.

1 Additionally, Plaintiff continues to create confusion through the use of overly
2 broad and internally inconsistent definitions, which conflict with other definitions it
3 has provided. Plaintiff identifies the “The Board of Directors of Peoples College of
4 Law” as a “collective decision-making body” from which Plaintiff “seeks relief
5 against both the board as an institutional component of the PCL corporate entity and
6 against its individual members as named defendants in their personal and official
7 capacities.” [See ¶ 3A.] Plaintiff later defines “The Board of Directors” as PCL’s
8 “governing body . . . responsible for overall management and strategic decision.”
9 Plaintiff defines “Officers” as “individuals holding executive positions within the
10 institution, including roles such as President, Dean, and other senior administrators.”
11 Plaintiff also defines “Agents of the Peoples College of Law” as “individuals or
12 entities acting on behalf of or under the institution’s authority, including faculty,
13 staff, and contractors.” Further creating confusion, Plaintiff later defines
14 “Defendants” separately within the first cause of action [See ¶ 104.] The various
15 identifications and defined terms create considerable confusion—issues raised in
16 prior motions to dismiss—and remain unaddressed in the Proposed Fifth Amended
17 Complaint.

18 Furthermore, Plaintiff’s Proposed Fifth Amended Complaint still does not
19 address the repeated admonition and deficiency raised by this Court and Defendants.
20 Namely, Plaintiff still incorporates by reference numerous prior paragraphs into his
21 causes of action. For example, Plaintiff failed to correct Paragraph 92, which states:

22 Plaintiff re-alleges and incorporates by reference each allegation
23 contained in Paragraphs 33-84, focusing on the facts that demonstrate
24 the pattern of racketeering activity, including wire and mail fraud (see
25 ¶¶ 33, 35, 37, 38, 41, 42, 76, 84), systematic misrepresentation and
26 fraudulent schemes (¶¶ 33-40, 42-44, 46-57, 76, 84), institutional
27 failure and facilitated fraud (¶¶ 35, 37, 39, 41, 43, 46, 47, 49-57, 76,
28 84), and the financial and emotional damages suffered by the Plaintiff
as a direct result (see ¶¶ 33-84, 76, 84). Because the fraudulent actions
were carried out through electronic communications and postal
services, they are alleged to meet the definition of predicate acts under
RICO. (Plaintiff’s Proposed Fifth Amended Complaint at 25:22-26:3)

1 Plaintiff failed to address any of these deficiencies in the Proposed Fifth
2 Amended Complaint. [*Id.* at ¶ 92, 152, 168, 201i, and 219.] Truly, none of the
3 substantive issues raised either by this Court or in the pending motions to dismiss
4 the Fourth Amended Complaint have been addressed.

5 In sum, Plaintiff's request for leave to file a Proposed Fifth Amended
6 Complaint should be denied. Plaintiff has had amply opportunities to plead a viable
7 claim and has repeatedly failed to do so. Each successive complaint has introduced
8 new deficiencies, compounded the procedural complexity of the case, and imposed
9 significant, unnecessary burdens on Defendants. There is no legal or equitable
10 basis—under Rule 15(a)(2) or otherwise—to permit yet another round of pleading.
11 The Court should exercise its broad discretion to deny further leave to amend and
12 bring this prolonged cycle of deficient amendments to an end.

13 **IV. CONCLUSION**

14 For the foregoing reasons, Defendants respectfully request that the Court deny
15 Plaintiff's request for leave to amend his pleading and submission of his Proposed
16 Fifth Amended Complaint.

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1 DATED: May 30, 2025

HAIGHT BROWN & BONESTEEL LLP

By:



Arezoo Jamshidi

Allison E. Harvey

Attorneys for Defendants THE GUILD

LAW SCHOOL DBA PEOPLE'S

COLLEGE OF LAW, JOSHUA

GILLENS, WILLIAM MAESTAS,

BOARD OF DIRECTORS FOR THE

PEOPLE'S COLLEGE OF LAW,

CHRISTINA MARIN GONZALEZ;

ROGER ARAMAYO; ISMAIL

VENEGAS; CLEMENTE FRANCO;

HECTOR PENA; PASCUAL TORRES;

CAROL DEUPREE; JESSICA

VIRAMONTES; JUAN SARINANA;

ADRIANA ZUNIGA; PREM SARIN;

DAVID BOUFFARD; and HECTOR

SANCHEZ

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STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1

The undersigned party certifies that this brief contains 3146 words, which
complies with the word limit of L.R. 11-6.1.

DATED: May 30, 2025

HAIGHT BROWN & BONESTEEL LLP

By:



Arezoo Jamshidi

Allison E. Harvey

Attorneys for Defendants THE GUILD

LAW SCHOOL DBA PEOPLE'S

COLLEGE OF LAW, JOSHUA

GILLENS, WILLIAM MAESTAS,

BOARD OF DIRECTORS FOR THE

PEOPLE'S COLLEGE OF LAW,

CHRISTINA MARIN GONZALEZ;

ROGER ARAMAYO; ISMAIL

VENEGAS; CLEMENTE FRANCO;

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CAROL DEUPREE; JESSICA

VIRAMONTES; JUAN SARINANA;

ADRIANA ZUNIGA; PREM SARIN;

DAVID BOUFFARD; and HECTOR

SANCHEZ

PROOF OF SERVICE

Hill v. The Board of Directors, Officers, et al.

Case No. 2:23-cv-01298-JLS-CFM

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Diego, State of California. My business address is 402 West Broadway, Suite 1850, San Diego, CA 92101.


On May 30, 2025, I served true copies of the following document(s) described as **DEFENDANTS' OPPOSITION TO PLAINTIFF'S NOTICE OF SUBMISSION OF PROPOSED FIFTH AMENDED COMPLAINT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address acraig@hbblaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 30, 2025, at San Diego, California.



Amy Craig

SERVICE LIST
Hill v. The Board of Directors, Officers, et al.
Case No. 2:23-cv-01298-JLS-CFM

Todd R. G. Hill
41459 Almond Avenue
Quartz Hill, CA 93551

PRO SE

Email: toddryangregoryhill@gmail.com

Robert Ira Spiro
Spiro Law Corp
10573 West Pico Boulevard No 865
Los Angeles, CA 90064

Attorney for Robert Ira Spiro

Email: ira@spirolawcorp.com

Jean Roche Krasilnikoff
The State Bar of California
180 Howard Street
San Francisco, CA 94105-1639

Attorney for Defendants Suzanne Celia
Grandt, Vanessa Holton, et al.

Email: Jean.Krasilnikoff@calbar.ca.gov

Haight